

Sieffert, Margaret

From: Sieffert, Margaret
Sent: Monday, December 21, 2015 9:26 AM
To: Hall, Charles
Subject: FW: CISWI and Pyrolysis Units
Attachments: Green_Box_Flow_Diagrams.pdf

Other information from the call.

WDNR is going to request the facility to get something official from EPA otherwise they will classify them as CISWI. I sent them Sara's information to address the applicability request to. If I hear anything else I will pass it along.

-Margaret

From: Modak, Nabanita
Sent: Monday, December 21, 2015 9:11 AM
To: Sieffert, Margaret <Sieffert.Margaret@epa.gov>
Subject: FW: CISWI and Pyrolysis Units

FYI

From: Wright, Jonathan J - DNR [<mailto:Jonathan.Wright@wisconsin.gov>]
Sent: Tuesday, December 08, 2015 9:30 AM
To: Modak, Nabanita <Modak.Nabanita@epa.gov>
Subject: RE: CISWI and Pyrolysis Units

Nabanita,

Enclosed are the process flow diagrams included in the application. These diagrams primarily illustrate the operation of the reactors. Syngas from "Syngas Storage" will also be used when available to power an 84 MMBtu per hour boiler (natural gas and syngas), a 20 MMBtu per hour Yankee air cap dryer hood (natural gas and syngas), and two RICE engines rated at 484 kW each for plant electrical needs.

Jonathan

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Jonathan Wright

Phone: (920) 303-5432

Jonathan.wright@wisconsin.gov

From: Modak, Nabanita [<mailto:Modak.Nabanita@epa.gov>]
Sent: Monday, December 07, 2015 4:04 PM
To: Wright, Jonathan J - DNR
Cc: Mia, Marcia
Subject: RE: CISWI and Pyrolysis Units

Hi Jonathan,

As we were going over the applicability determination process related to the facility mentioned in your e-mail, we believe a process flow diagram (particularly describing how the syngas is being used in the GB Kool units and other combustion units in the facility) would be helpful. We would like to gain a better understanding of the flow path of the syngas and how it is tied to the GB Kool unit.

Thanks
Nabanita

From: Wright, Jonathan J - DNR [<mailto:Jonathan.Wright@wisconsin.gov>]
Sent: Monday, November 23, 2015 1:20 PM
To: Modak, Nabanita <Modak.Nabanita@epa.gov>
Subject: RE: CISWI and Pyrolysis Units

Nabanita,

Enclosed is an overview paragraph from the facility of their entire project.

The facility intends to install 4 pyrolysis units – known as GB Kool units – that process waste poly, plastic pellets supplied by another local company, and rubber. The rubber will be processed separately in order to recover the carbon black material for resale. Each pyrolysis unit is rated at up to 16,000 pounds of input feed per day. The plastic for the pellets supplied by another local company is sourced from solely industrial or commercial sources. The process waste poly coming from the pulping operations results from materials that may come from MSW, industrial or commercial sources. The facility has proposed permit limitations to keep MSW-derived materials to less than 30% by weight of the input feed to each pyrolysis unit.

Each pyrolysis unit is equipped with an external burner rated at approximately 0.5 MMBtu per hour. The external burners will start on propane and switch to syngas as it becomes available. Syngas will also be used throughout the facility to supplement natural gas or propane in other plant combustion units, such as the tissue machine Yankee dryer, as available.

Jonathan

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Jonathan Wright

Phone: (920) 303-5432

Jonathan.wright@wisconsin.gov

From: Modak, Nabanita [<mailto:Modak.Nabanita@epa.gov>]
Sent: Thursday, November 19, 2015 4:29 PM
To: Wright, Jonathan J - DNR
Cc: Mia, Marcia
Subject: RE: CISWI and Pyrolysis Units

Hi Jonathan,

Could you please send me some information on the details of the entire process. How is the waste being processed before it gets to pyrolysis oven? What did you mean by external pyrolysis burner? By any chance, are the non-condensable gases being used as a fuel to the pyrolysis burner? . I think a detailed description of the process will help us in applicability determination.

Thanks
Nabanita

From: Wright, Jonathan J - DNR [<mailto:Jonathan.Wright@wisconsin.gov>]
Sent: Tuesday, November 17, 2015 4:31 PM
To: Modak, Nabanita <Modak.Nabanita@epa.gov>
Subject: RE: CISWI and Pyrolysis Units

Thanks for the update. Let me know if you require additional information on the process or the input materials.

Jonathan

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Jonathan Wright

Phone: (920) 303-5432

Jonathan.wright@wisconsin.gov

From: Jones, Toni
Sent: Monday, November 16, 2015 2:07 PM
To: Wright, Jonathan J - DNR <Jonathan.Wright@wisconsin.gov>
Cc: Modak, Nabanita <Modak.Nabanita@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>
Subject: RE: CISWI and Pyrolysis Units

Hi Mr. Wright,
I hope this email finds you well today.

Please note, Nabanita Modak is the current project lead for the CISWI rulemaking. I have cc'd Nabanita, along with our colleague in the Office of Enforcement and Compliance Assurance, Marcia Mia, on this email. Please allow them the opportunity to review your email below, and one of them will follow-up with you shortly.

Kind regards,
Toni

Toni Wyche Jones, EI, CFM | Fuels & Incineration Group | Sector Policies & Programs Division - Mail Code E143-05 | Office of Air Quality Planning & Standards | U.S. Environmental Protection Agency | RTP, NC 27711 | Phone: (919) 541-0316 |

From: Wright, Jonathan J - DNR [<mailto:Jonathan.Wright@wisconsin.gov>]
Sent: Friday, November 13, 2015 3:11 PM
To: Jones, Toni
Subject: CISWI and Pyrolysis Units

Ms. Jones,

The Wisconsin Department of Natural Resources recently received a construction permit application for a gasification project that will use pyrolysis to convert industrial and commercial waste plastics and rubber into carbon char, a liquid residue for fuel refining, and non-condensable gases to be used as fuel by other unrelated processes on-site and the external

burner for the pyrolysis ovens. I am attempting to determine whether 40 CFR 60 subpart CCCC – CISWI would be applicable to this project. Would you be the right person with whom to discuss CISWI applicability?

Jonathan

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Jonathan Wright

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